



North County Watch

Looking Out Today For Tomorrow

California Department of Toxic Substances Control
Office of Policy
P.O. Box 806
Sacramento, California 98512-0806

Attn: Ellen Haertle Sent Via Email: ehaertle@dtsc.ca.gov

August 10, 2010

RE: Policy for the Regulation of Solar Panels R 2010-01

Dear Ms. Haertle,

North County Watch is a 501 c3 nonprofit organization committed to sustainable development and environmental issues in north San Luis Obispo County.

We request that policies be adopted that:

- Require PV hazardous waste be fully regulated as hazardous waste.
- All PV panels sold in California be tested for toxicity and be clearly labeled as hazardous waste as is warranted. Neither the public nor waste facilities nor recycling facilities will have the ability to distinguish hazardous PV components from non-hazardous without mandated labeling.
- Mandate requirements for Extended Producer Responsibility. We are on the cusp of an explosion of PV installations – utility scale, industrial and small scale. The short life of PV panels require that we look forward at the issues of recycling the spent materials now so that we have in place viable methods for safe disposal.
- Mandate a pre-financed collection and recycling plan. Let's plan to cover the costs of disposal up front as a realistic and necessary component of the actual cost of PV. Cursory estimates of cadmium compounds that will need to be recycled in less than 2 decades suggest that we will have a massive disposal problem and the potential for localized contamination from mishandled, or illegally disposed of panels.

Thank you for your consideration of our comments.

Respectfully,

Susan A. Harvey
President
805-239-0542

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North County Watch P.O. Box 455 Templeton, CA 93465